

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT PIERCE DIVISION**

MARK ROGOLINO, individually and
on behalf of all other similarly situated,

Plaintiff,

v.

WALMART, INC.,

Defendant.

CASE NO. 2:24-cv-14308

**DEFENDANT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and this Court's Local Rules,

Defendant Walmart, Inc., respectfully requests a 45-day enlargement of time within which to move, plead, or otherwise respond to Plaintiff's Complaint (ECF No. 1-1). This is our first requested extension of time. The undersigned has conferred with counsel for Plaintiff, who does not oppose the requested extension.

We respectfully submit that good cause supports this request. The undersigned counsel requires additional time to respond given the complexity of the issues raised in the Complaint and the putative class action nature of the allegations. Moreover, this proposed extension would not alter any other deadlines in this matter. Lastly, Plaintiff does not oppose this requested extension.

For these reasons, we respectfully request that the Court grant Defendant's motion for a 45-day extension of time, permitting Defendant to move, plead, or otherwise respond to Plaintiff's Complaint on or before November 11, 2024.

Pursuant to Local Rule 7.1(a)(2), a proposed order is attached to this motion.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), I hereby certify that on or before September 26, 2024, I conferred with counsel for Plaintiff and he has agreed to the relief requested in this motion.

Date: September 26, 2024

Respectfully submitted,

/s/ Bret R. Vallacher
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